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Counsel for Defendant GUZMAN

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,) No. CR 13-0070 RS (MEJ)
11 Plaintiff,)
12 v.) STIPULATION AND [PROPOSED]—
13) ORDER TO MODIFY CONDITIONS OF
14 HECTOR JOSE CHAMERRY GUZMAN,) RELEASE
15 Defendant.)

On February 15, 2013, defendant Guzman was released on a \$75,000 unsecured bond with the condition that he be subject to electronic monitoring and a curfew. Mr. Guzman was subsequently released from immigration custody with the condition that he be subject to electronic monitoring. As a result, Mr. Guzman has been wearing two ankle bracelets—one for immigration and one for district court—since February.

22 Mr. Guzman now requests that the Court modify his conditions of release to remove the
23 conditions that he be subject to electronic monitoring and a curfew. He has been compliant with
24 all his conditions of pretrial release for four straight months. He has maintained contact with his
25 pretrial services officer, obtained employment at a car wash, and continued to care for his five-
26 year old son. He does not have a drug or alcohol problem. Pretrial Services Officer Anthony

1 Granados has verified that Mr. Guzman has not had any violations of his conditions of release,
2 and he concurs with the proposal to remove both the electronic monitoring and curfew
3 conditions. He also indicated that Pretrial Services is currently paying for Mr. Guzman's ankle
4 bracelet but they would like Mr. Guzman to start paying for it, and Mr. Guzman does not have
5 the funds to pay.

6 Mr. Guzman is scheduled to be sentenced on June 25, 2013. Given his excellent behavior
7 on release and compliance with his conditions, as well as the fact that he is unnecessarily wearing
8 two ankle bracelets, Mr. Guzman respectfully requests that the Court remove the conditions that
9 he be subject to electronic monitoring and a curfew. All other conditions shall remain in place.
10 The government does not oppose this request.

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12 IT IS SO STIPULATED.

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14 MELINDA HAAG
United States Attorney

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6/5/13

/s/

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DATED

SUZANNE MILES
Assistant United States Attorney

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STEVEN KALAR
Federal Public Defender

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6/5/13

/s/

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DATED

RITA BOSWORTH
Assistant Federal Public Defender

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In light of the parties' stipulation, it is hereby ORDERED that the defendant's conditions

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26 STIP. & [PROPOSED] ORDER TO MODIFY
CONDITIONS OF RELEASE *US v. Guzman*,
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1 of release shall be modified such that the conditions that he be subject to electronic monitoring
2 and a curfew are removed. All other conditions shall remain in place.

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4 June 7, 2013

5 DATED


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MARIA ELENA JAMES
United States Magistrate Judge